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STATE OF KANSAS

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DEPARTMENT OF HEALTH AND ENVIRONMENT

Forbes Field

Topeka, Kansas 66620-0001

Phone (913) 296-1500

Mike Hayden, Governor

Stanley C. Grant, Ph.D., Secretary

Gary K. Hulett, Ph.D., Under Secretary

April 21, 1988

Mr. Richard S. Hendey, Jr.
Manager, Regional Environmental Affairs
Olin Corporation
P.O. Box 1355
Stamford, Connecticut 06904-1355

Re: RCRA Financial Assurance
Kansas City, Kansas
EPA I.D. Number KSD000203638

Dear Mr. Hendey:

The financial test documentation submitted by Olin on March 18, 1988 to demonstrate financial assurance for closure care and liability coverage at the Kansas City, Kansas TSD facility has been reviewed.

Two format errors were present in the letter from the chief financial officer. The format of the entire letter itself was incorrect in that it followed an outdated version of 40 CFR 264.151 (g) that was revised in July 1986. The revised format for this document went into effect in Kansas in May 1987 and a copy is enclosed for your review. Secondly, the Kansas City, Kansas facility should have been listed in the response to numbered item three of the letter, not numbered item one. The State of Kansas is authorized to implement the RCRA financial regulations in lieu of EPA in our state, thus the letter must reflect this.

Both of the items needing revision were discussed in the Kansas Department of Health and Environment's letter of April 29, 1987 to Olin last year and asked to be addressed when preparing the submittal for 1988. As this was not done, the Kansas Department of Health and Environment will not consider the Kansas City facility to be in full compliance with the 40 CFR 264 Subpart H requirements until an appropriately revised letter from the chief financial officer is received.



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This submittal must be received by May 20, 1988. If you have any questions concerning this matter please call me at (913) 296-1612.

Sincerely,

Brenda Clark

Brenda Clark
Environmental Engineer
Hazardous Waste Section
Bureau of Waste Management

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Enclosure

C Mike Wolfram ✓

Jim Fischer

William Dame